

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

UNIVERSITY OF NORTH CAROLINA; UNIVERSITY OF NORTH CAROLINA BOARD OF GOVERNORS; JOHN C. FENNEBRESQUE, W. LOUIS BISSETTE, JR., JOAN TEMPLETON PERRY, ROGER AIKEN, HANNAH D. GAGE, ANN B. GOODNIGHT, H. FRANK FRAINGER, PETER D. HANS, THOMAS J. HARRELSON, HENRY W. HINTON, JAMES L. HOLMES, JR, RODNEY E. HOOD, W. MARTY KOTIS III, G. LEROY LAIL, SCOTT LAMPE, STEVEN B. LONG, JOAN G. MACNEILL, MARY ANN MAXWELL, W. EDWIN MCMAHAN, W. G. CHAMPION MITCHELL, HARI H. MATH, ANNA SPANGLER NELSON, ALEX PARKER, R. DOYLE PARRISH, THERENCE O. PICKETT, DAVID M. POWERS, ROBERT S. RIPPY, HARRY LEO SMITH, JR., J. CRAIG SOUZA, GEORGE A. SYWASSINK, RICHARD F. TAYLOR, RAIFORD TRASK III, PHILLIP D. WALKER, LAURA I. WILEY, as members of the Board of Governors in their official capacities; THOMAS W. ROSS, President of the University of North Carolina in his Official Capacity; UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL; CAROL L. FOLT, Chancellor of the University of North Carolina at Chapel Hill in her Official Capacity; UNIVERSITY OF NORTH CAROLINA BOARD OF TRUSTEES; W. LOWRY CAUDILL, ALSTON GARDNER, SALLIE SHUPING-RUSSELL, JEFFERSON W. BROWN, PHILLIP L. CLAY, HAYWOOD D. COCHRANE, DONALD WILLIAMS CURTIS, CHARLES G. DUCKETT, PETER T. GRAUER, KELLY MATTHEWS HOPKINS, STEVEN LERNER, DWIGHT D. STONE, ANDREW HENRY POWELL, as members of the Board of Trustees in their Official Capacity; JAMES W. DEAN JR., Executive Vice Chancellor and Provost in his Official Capacity; STEPHEN M. FARMER, Vice Provost, Enrollment, and Undergraduate Admissions in his Official Capacity,

Defendants.

Civil Action No. _____

DECLARATION OF EDWARD J. BLUM

Edward J. Blum, pursuant to 28 U.S.C. § 1746, declares the following:

1. I am an individual over twenty-one years of age, and of sound mind, who has never been convicted of a felony, is capable of making this declaration, and am fully competent to declare as to matters stated herein.

2. I am the President of Students for Fair Admissions, Inc. ("SFFA"), which is an Internal Revenue Code Section 501(c)(3) organization formed for the purpose of defending human and civil rights secured by law, including the right of individuals to equal protection under the law, through litigation and any other lawful means. More specifically, SFFA seeks to promote and protect the right of the public to be free from discrimination on the basis of race in higher education admissions.

3. SFFA is a coalition of prospective applicants and applicants to higher education institutions who were denied admission to higher education institutions, their parents, and other individuals who support the organization's purpose and mission of eliminating racial discrimination in higher education admissions. SFFA has members throughout the country.

4. SFFA has at least one member ("Applicant") who applied for and was denied admission to UNC Chapel-Hill's 2014 entering class.

5. Applicant is White.

6. Applicant had a weighted GPA of 4.4839 at a public high school that U.S. News and World Report ranks as one of the top five high schools in North Carolina and in the top 1 percent of all high schools nationwide.

7. Applicant achieved a score of 2180 on the SAT I (800 Reading (Perfect) + 710 Math + 670 Writing). Applicant achieved a perfect score of 800 for SAT II Physics and a perfect score of 800 for SAT II Math. Applicant also had a composite ACT score of 32.

8. Applicant completed five Advanced Placement ("AP") courses, scoring a perfect "5" in all but one AP exam and scoring a "4" in the other. Applicant was named an AP Scholar of Distinction.

9. While in high school, Applicant participated in numerous extracurricular and volunteer activities. Among other things, Applicant was a member of the varsity cross country team, a teaching associate for students in Latin II, completed a collegiate computer programming course, and held a part-time job.

10. Applicant was denied the opportunity to compete for admission to UNC-Chapel Hill on equal footing with other applicants on the basis of race or ethnicity due to UNC-Chapel Hill's discriminatory admissions policies.

11. Applicant was accepted to and has enrolled at another university in North Carolina. Applicant is ready, able, and intends to seek to transfer to the UNC-Chapel Hill when it stops discriminating against applicants on the basis of race and ethnicity in violation of the Fourteenth Amendment and federal civil rights laws.

12. SFFA has members who are currently in high school and intend to apply for admission to UNC-Chapel Hill ("Future Applicants").

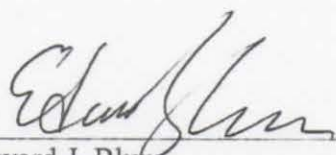
13. Future Applicants will be denied the opportunity to compete for admission to UNC-Chapel Hill on equal footing with other applicants on the basis of race or ethnicity due to UNC-Chapel Hill's discriminatory admissions policies. As a result, Future Applicants may be denied admission to UNC-Chapel Hill because of these discriminatory policies.

14. SFFA has members whose children intend to apply for admission to UNC-Chapel Hill ("Parents").

15. Parents' children will be denied the opportunity to compete for admission to UNC-Chapel Hill on equal footing with other applicants on the basis of race or ethnicity due to UNC-Chapel Hill's discriminatory admissions policies. As a result, Parents' children may be denied admission to UNC-Chapel Hill because of these discriminatory policies.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, November ~~14~~ 2014.


Edward J. Blum